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July 23, 1981

Messrs. Max H. Crohn, Jr.
Alexander Holtzman
Ernest Pepples
Arthur J. Stevens

Please find enclosed Draft 7-23 of Document 1 and its subparts. Much of the difference between the 7-9 drafts and the enclosure is in the arrangement. We are continuing to work but I thought it might be useful to send this prior to the meeting on July 30.

Janet Brown has indicated that she will look at the FTC staff's claim that there has been a significant increase in scientific evidence on smoking and health in recent years. I will talk further with Ed Jacob about possible expansion of the point dealing with the staff's review of the 1979 TI review and welcome additional observations.

I would appreciate Dave Cynamon's again conveying my appreciation to TI for its contribution to the smoking and health material sent out with my earlier letter. I have written both Drs. Kastenbaum and Schafer suggesting that they convey any additional views they have to me.

Redundant (and unoriginal) as it is to note it here, we should consider examining documents to be filed (smoking and health or others) from the point of view of any rebuttal expected. This can affect when our documents should be filed. Our timing can be affected also by responses that we may want to make to documents and comments filed by others. If we file something within the next couple of months then perhaps we would want to file a supplement later. Another option is to simply wait and

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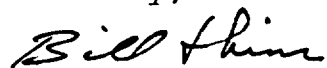
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file one document toward the end of the filing period. We should play the role of "devil's advocate" with respect to arguments that will probably be forthcoming and prepare necessary responses. In the case of smoking and health, this probably means having background papers available which can be utilized if necessary to respond to particular arguments. [I do not intend at this time to make any recommendation pro or con with regard to whether we should respond.] Who should be asked (e.g., on the Hill) to "react" to proposed filings? Is there any separate "education" of significant persons that should be "tied in" with the response? What is T.I.'s public relation role during the comment period? Afterwards?

We are continuing to review the enclosed paper ourselves; please be our guest in making comments or suggestions for additional points to be covered.

Sincerely,



William W. Shinn

WWS/rf
Enclosure

cc: Fredric S. Newman (with enclosures)
J. Kendrick Wells III (" ")
David J. Cynamon (" ")
Edwin J. Jacob (" ")
Janet Brown (with 2 copies of enclosures)
Francis K. Decker, Jr. (" " " " ")

Joseph H. Greer (without enclosures)
Arnold Henson (" ")

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